

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:	21 cv 7532 (CM)
PURDUE PHARMA L.P., <i>et al.</i> ,	21 cv 7585 (CM)
BANKRUPTCY APPEALS	21 cv 7961 (CM)
	21 cv 7962 (CM)
	21 cv 7966 (CM)
	21 cv 7969 (CM)
	21 cv 8034 (CM)
This Filing Relates to	21 cv 8042 (CM)
	21 cv 8049 (CM)
	21 cv 8055 (CM)
	21 cv 8139 (CM)
ALL MATTERS	21 cv 8258 (CM)
	21 cv 8271 (CM)
	21 cv 8548 (CM)
	21 cv 8557 (CM)
	21 cv 8566 (CM)
	On Appeal from the United States Bankruptcy Court for the Southern District of New York

**AMENDED STIPULATION**

Pursuant to the Court’s *Memorandum and Order Denying Without Prejudice the United States Trustee’s Emergency Motion for a Stay Pending Appeal* (No. 21-cv-7969, Dkt. No. 48) (the “**Order**”) and *Order Correcting Prior Decision* (No. 21-cv-7532, Dkt. No. 69), it is hereby stipulated and agreed, by and between the undersigned parties (the “**Parties**”), as follows:<sup>1</sup>

1. The Parties shall not at any time argue before any court that the pending appeals in the above-captioned actions of the *Findings of Fact, Conclusions of Law, and Order Confirming the Twelfth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and its Affiliated Debtors*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.), Dkt No. 3787 (the “**Confirmation Order**”), including any appeals of the Confirmation Order that have been filed

<sup>1</sup> Capitalized terms used but not defined herein shall have the meaning set forth in the Order.

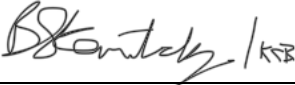
but not yet docketed, have been rendered equitably moot by the actions undertaken in advance of the Effective Date in furtherance of carrying out the Plan pursuant to the Confirmation Order or the Order (I) Authorizing the Debtors to Fund Establishment of the Creditor Trusts, the Master Disbursement Trust and Topco, (II) Directing Prime Clerk LLC to Release Certain Protected Information, and (III) Granting Related Relief, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.), Dkt No. 3773 (the “**Advance Order**”).

2. For the avoidance of doubt, this stipulation does not address the criminal sentencing of Purdue Pharma L.P. or the effect or consequences of such sentencing on these or other appeals.

3. This stipulation may be signed in counterparts, which, when fully executed, shall constitute a single original. A facsimile or scanned copy of this stipulation shall have the same force and effect as the original.

Dated: October 20, 2021  
New York, New York

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<sup>2</sup> As defined in Amended and Restated Case Stipulation Among the Debtors, the Official Committee of Unsecured Creditors and Certain Related Parties dated Nov. 20, 2019 ¶ 1, In re Purdue Pharma L.P., No. 19-23649-rdd (Bankr. S.D.N.Y. Nov. 20, 2019), ECF No. 518. Certain of the Mortimer-side Initial Covered Sackler Persons preserve and do not waive any defenses to jurisdiction in the event that the Twelfth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and Its Affiliated Debtors, In re Purdue Pharma L.P., No. 19-23649-rdd (Bankr. S.D.N.Y. Sept. 2, 2021) is not effectuated.